

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

SUZI ALTMAN

PLAINTIFF

v.

CIVIL ACTION NO. 3:16cv883-CWR-LRA

UNIVERSITY PRESS OF MISSISSIPPI
AND HALEY R. BARBOUR

DEFENDANTS

ALL PARTIES' CONSENT MOTION FOR TEMPORARY STAY

Plaintiff Suzi Altman ("Altman"), Defendants University Press of Mississippi ("UP") and Haley R. Barbour ("Barbour"), jointly move for a temporary stay of this Action. Movants state as follows:

1. This is a copyright infringement suit.
2. Under the Court's current [14] Rule 16 Initial Order, the Parties CSMs and a proposed CMO are due on Thursday, February 16 and a CMC is set for Thursday, February 23, 2017.
3. After a lengthy and productive period of factual investigation, involving the review and comparison of numerous photographs, the Parties are conferring in good faith in an effort to resolve this matter by agreement.
4. The Parties desire a three week stay of this matter, so as to afford them time to attempt to reach a mutually satisfactory resolution, while minimizing the incurrence of additional attorneys' fees, costs and expenses in the interim.
5. The Parties also request the cancellation of the current Thursday, February 23, 2017 CMC and all attendant deadlines set forth in this Court's current [14] Rule 16 Initial Order, with a new Rule 16 Order to issue, if and only if, this matter is not resolved by agreement during the stay period.

6. This motion is not interposed for the purpose of engendering unnecessary delay.

WHEREFORE, PREMISES CONSIDERED, Altman, UP and Barbour move this Court:

- (1) To stay this Action for a period of 21 calendar days from the date of this Court's order; and
- (2) To cancel the current Thursday, February 23, 2017 CMC and all attendant deadlines set forth in this Court's current [14] Rule 16 Initial Order, with a new Rule 16 Order to issue, if and only if, this matter is not resolved by agreement during the stay period.

Movants also move for such additional, supplemental or alternative relief as may be appropriate in the premises.

DATED, this 8th day of February, 2017.

Respectfully submitted,

SUZI ALTMAN

By: s/ Bill Lockett (MB # 1487)
Bill Lockett (MB # 1487)

HER ATTORNEY

OF COUNSEL:

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HALEY R. BARBOUR

By: s/ E. Barney Robinson III (MB # 09432)
John C. Henegan, (MB # 2286)
E. Barney Robinson III (MB # 09432)

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UNIVERSITY PRESS OF MISSISSIPPI

By: s/ Lawrence A. Schemmel (MB # 9811)
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CERTIFICATE OF SERVICE

I, E. Barney Robinson III, one of the attorneys for Haley R. Barbour, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following via CM/ECF:

Bill Luckett (MB # 1487)
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ATTORNEY FOR DEFENDANT UNIVERSITY PRESS OF MISSISSIPPI

THIS the 8th day of February, 2017.

By: s/E. Barney Robinson III (MB # 09432)
E. Barney Robinson III (MB # 09432)